

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

DONALD BERDEAUX and CHRISTINE
GRABLI, Individually and on Behalf
of All Others Similarly Situated,

Plaintiffs,

v.

ONECOIN LTD.; RUJA IGNATOVA,
SEBASTIAN GREENWOOD; MARK SCOTT;
DAVID PIKE; NICOLE J. HUESMANN;
GILBERT ARMENTA; and THE BANK OF
NEW YORK MELLON,

Defendants.

Case No. 1:19-cv-04074-VEC

Hon. Valerie E. Caproni

**NOTICE OF MOTION TO DISMISS
AND/OR FOR MORE DEFINITE
STATEMENT**

**ORAL ARGUMENT
REQUESTED**

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PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law dated December 21, 2020, and the Declaration of Nicole J. Huesmann, dated May 1, 2020, and all the pleadings and prior proceedings had herein, Defendant, Nicole J. Huesmann, will move this Court, before the Honorable Valerie E. Caproni, at the United States District Court, Southern District of New York, 40 Foley Square, New York, New York 10007, for an Order, pursuant to FED. R. CIV.

P. 12(b)(2) and 12(b)(6), dismissing with prejudice the Plaintiff's Second Amended Class Action Complaint in its entirety as against this Defendant and/or for a more definite statement, pursuant to FED. R. CIV. P. 12(e).

PLEASE TAKE FURTHER NOTICE that Defendant, Nicole J. Huesmann, requests oral argument on a date and at a time designated by the Court.

Dated: December 21, 2020

Respectfully submitted,

/s/ Bradley A. Silverman

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